



Solutia Inc.
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July 15, 1999

Mr. Michael McAteer
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)
• **July 1999 Monthly Report**

Dear Mr. McAteer,

Enclosed is the July 1999 Monthly Report for the Sauget Sites Area I. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

A handwritten signature in dark ink, appearing to read "D. M. Light", is written over the printed name.

D. M. Light
Manager, Remedial Projects
Solutia Inc.

cc:

T. Gouger - USACE
C. Morin - IEPA
Mayor M. King - Cahokia
Sauget File - Solutia

Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Monthly Report

Date of Report: July 15, 1999
Period Covered: June 19, 1999 - July 15, 1999
Next Report Period: July 16, 1999 - August 18, 1999

Work Performed during the reporting period

- None

Work scheduled for next reporting period

- None

Problems and Solutions

- None

Submittal Schedule Status (see attached)

- The April 8, 1999 revised SSP submittal to U. S. EPA was disapproved June 3, 1999. In its response, U. S. EPA requested that Solutia complete the EECA / RIFS field sampling collection activities 5 months after start. Solutia is unable to commit to the requested timing and met with U. S. EPA June 22 in Chicago to review project schedule.
- A revised submittal of the SSP with revised schedule was made June 25, 1999. The June 25 SSP submittal remains under review by the Agencies.

Issues under review

- **Dead Creek Flooding** - A hydraulic study of Dead Creek has been completed. Preliminary results indicate that elimination of the restricted culverts will not appreciably affect the flooding conditions. A final report will be issued July 15.
 - **UAO to address flooding** - U. S. EPA UAO - Docket No. V-W-99-C-554 - was issued to Solutia and received June 28. The UAO requires replacement of the culverts on Dead Creek to address flooding of Dead Creek. An alternative proposal to address the cause of the flooding and the contaminated sediments directly was made to U. S. EPA by Solutia July 15 at a conference in Cahokia.
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Comments

1. The AOC field operations facilities were completed.
2. The focus during the next report period will be on approval of the revised SSP and initiation of the field work.
3. Solutia will formally respond on July 15 to the U. S. EPA UAO to replace the culverts in Dead Creek.
4. Access Agreements' procurement will continue on a high priority basis.

January 21, 1999 Sauget Area I AOC

SCHEDULE
(7/99 Revision)

1. Designation of Contractor	Completed 3/10/99 ¹
2. Designation of Other Contractors	5 Business Days Before Start of Work
3. Designation of Project Coordinator	Completed
4. Submit Support Sampling Plan (SSP)	Submitted February 22, 1999
5. Submit Revised SSP	April 8, 1999 ² June 25, 1999 ³
6. Obtain Access Agreements	July 1, 1999 ⁴
7. Submit Health and Safety Plan (HASP)	With Revised SSP (Item 5) submittal
8. Submit Quality Assurance and Sampling Plan (QAPP)	With Revised SSP (Item 5) submittal
9. Sampling Notification	10 Business Days Prior to Start of Work
10. Submit Data Report	TBD (Pending approval of SSP Work Schedule)
11. Submit EE/CA Report	60 Calendar Days After Data Report Submittal

¹ Per March 10, 1999 memo DML to M. McAteer re "Notification of Contractors and Contractor Qualifications"

² Per 3/19/99 e-mail from M. McAteer to M. Light, AOC schedule modified to "21 days after receipt of USEPA comments from the February 22, 1999 SSP submittal". USEPA comments on the 2/22/99 SSP submittal were received 3/19/99. Revised SSP submitted to USEPA April 8, 1999 and disapproved June 3, 1999.

³ April 8, 1999 SSP submittal disapproved June 3, 1999. Revised plan due to the Agency June 25, 1999. Revised plan submitted June 25th as required.

⁴ Per 5/21/99 phone call from M. McAteer to M. Light, AOC schedule modified to "July 1, 1999 with interim report due on June 15, 1999", consistent with Solutia's request in a May 18, 1999 Access report and request for extension.

January 21, 1999 Sauget Area I AOC

SCHEDULE (Cont.)
(7/99 Revision)

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|---------------------------------|---|
| 12. Submit Revised EE/CA Report | 21 Calendar Days After Receipt
of EPA Comments |
| 13. Submit RI/FS Report | 90 Calendar Days After Data
Report Submittal |
| 14. Submit Revised RI/FS Report | 21 Calendar Days After Receipt of
EPA Comments |
| 15. Progress Reports | Monthly Beginning February 19,
1999 |